

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBIS CAPITAL PARTNERS, L.P. and
GLOBIS OVERSEAS FUND, LTD.,
individually and on behalf of all others
similarly situated,

Plaintiffs,

-against-

THE CASH STORE FINANCIAL
SERVICES INC., GORDON REYKDAL,
CRAIG WARNOCK, NANCY BLAND, and
MICHAEL SHAW,

Defendants.

No. 13 Civ. 3385 (VM)

STIPULATION AND ORDER OF DISMISSAL

WHEREAS, on November 19, 2015, FTI Consulting Canada Inc., the monitor (the "Monitor") appointed by the Ontario Superior Court of Justice, Commercial List (the "Ontario Court") and foreign representative of The Cash Store Financial Services Inc. ("Cash Store") in a proceeding (the "Canadian Proceeding") under Canada's Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended, pending before the Ontario Court, filed a Plan Sanction Order (the "Plan Sanction Order") and corresponding Endorsement (the "Endorsement") entered by the Ontario Court on November 19, 2015;

WHEREAS, the Plan Sanction Order sanctioned the plan of compromise and reorganization, dated October 6, 2015, filed with the Ontario Court (the "Plan"), which, among other things, sought the approval of a definitive Settlement Agreement, dated September 22, 2015 (the "D&O/Insurer Global Settlement Agreement"), pursuant to which, among other things, the parties to the above-captioned action (the "Action") sought to resolve all claims that have been asserted or could have been asserted by Lead Plaintiffs, individually and on behalf of all persons similarly situated, against Defendants in this Action;

WHEREAS, on November 25, 2015, the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) entered an Order Granting Recognition and Related Relief in the action captioned *In re: The Cash Store Financial Services Inc.*, Debtor in a Foreign Proceeding, Case No. 15-12813 (Bankr. S.D.N.Y.) (MEW) (the “Recognition Order”), a copy of which is annexed hereto as Exhibit A; and

WHEREAS, among other things, the Recognition Order recognized the Canadian Proceeding as a foreign main proceeding pursuant to section 1517(b)(1) of the United States Bankruptcy Code, held that all relief under section 1520 of the Bankruptcy Code would apply in such case, and further held that the releases contained in sections 7.1 (c), (d), (f), (g) and (n) of the Plan as contemplated by the D&O/Insurer Global Settlement Agreement, and the injunctions contained in section 7.3 of the Plan, as approved by the Plan Sanction Order, were to be given full force and effect in the United States pursuant to sections 105, 1507 and 1521 of the Bankruptcy Code; provided, however, that nothing in this order shall operate to enjoin the exercise of any police or regulatory power by a governmental unit or to release any claim based on the exercise of such police or regulatory power, including the enforcement of a judgment other than a monetary judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit’s police or regulatory power.

NOW THEREFORE, in consideration of the forgoing recitals, the Parties agree as follows:

IT IS HEREBY STIPULATED, AGREED AND ORDERED, by and between the parties, that this Action shall be dismissed with prejudice pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, each party to bear its own costs and fees.

Dated: December 7, 2015

Respectfully submitted,

PAUL WEISS RIFKIND WHARTON &
GARRISON LLP

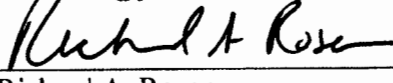
1285 Avenue of the Americas

New York, NY 10019-6064

Tel: (212) 373-3000

Fax: (212) 757-3990

Email: rosen@paulweiss.com

By:  *ryd*

Richard A. Rosen

*Counsel for defendant The Cash Store
Financial Services Inc.*

AXINN VELTROP & HARKRIDER LLP

114 West 47th Street, 22nd Floor

New York, NY 10036

Tel: (212) 728-3000

Fax: (212) 728-2201

Email: trohback@axinn.com

By: _____

Thomas G. Rohback

Counsel for Defendant Nancy Bland

MAYER BROWN

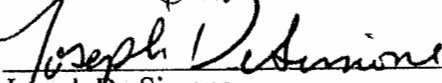
1221 Avenue of the Americas

New York, NY 10020-1001

Tel: (212) 506-2559

Fax: (212) 849-5559

Email: desimone@mayerbrown.com

By: 

Joseph De Simone

Counsel for Defendant Craig Warnock

NOW THEREFORE, in consideration of the forgoing recitals, the Parties agree
as follows:

IT IS HEREBY STIPULATED, AGREED AND ORDERED, by and between
the parties, that this Action shall be dismissed with prejudice pursuant to Rule 41(a) of the
Federal Rules of Civil Procedure, each party to bear its own costs and fees.

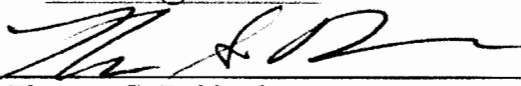
Dated: December __, 2015

Respectfully submitted,

PAUL WEISS RIFKIND WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: (212) 373-3000
Fax: (212) 757-3990
Email: rrosen@paulweiss.com

By: _____
Richard A. Rosen
*Counsel for defendant The Cash Store
Financial Services Inc.*

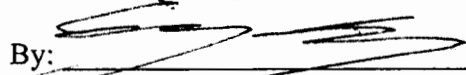
AXINN VELTROP & HARKRIDER LLP
114 West 47th Street, 22nd Floor
New York, NY 10036
Tel: (212) 728-3000
Fax: (212) 728-2201
Email: trohback@axinn.com

By:  _____
Thomas G. Rohback
Counsel for Defendant Nancy Bland

MAYER BROWN
1221 Avenue of the Americas
New York, NY 10020-1001
Tel: (212) 506-2559
Fax: (212) 849-5559
Email: desimone@mayerbrown.com

By: _____
Joseph De Simone
Counsel for Defendant Craig Warnock

TORYS LLP
1114 Avenue of the Americas, 23rd Floor
New York, NY 10036
Tel: 212.880.6268
Fax: 212.682.0200
Email: ccaparelli@torys.com

By: 
Christopher M. Caparelli
Counsel for defendant Michael Shaw

GORDON REYKDAL
Defendant *pro se*

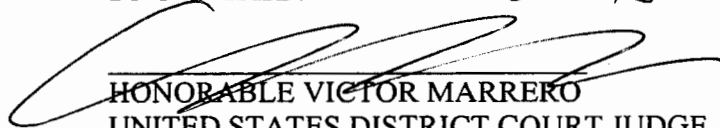
KIRBY McINERNEY LLP
825 Third Avenue, 16th Floor
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540
Email: ipress@kmlp.com

By: _____
Ira M. Press
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

HOFFNER PLLC
800 Third Avenue, 13th Floor
New York, NY 10022
Tel: (212) 471-6203
Fax: (212) 935-5012
Email: hoffner@hoffnerpllc.com


By: _____
David S. Hoffner
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

SO ORDERED: *10 December 2015*


HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT COURT JUDGE
SOUTHERN DISTRICT OF NEW YORK

TORYS LLP
1114 Avenue of the Americas, 23rd Floor
New York, NY 10036
Tel: 212.880.6268
Fax: 212.682.0200
Email: ccaparelli@torys.com

By: _____
Christopher M. Caparelli
Counsel for defendant Michael Shaw



GORDON REYKDAL
Defendant *pro se*

KIRBY McINERNEY LLP
825 Third Avenue, 16th Floor
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540
Email: ipress@kmlp.com

By: _____
Ira M. Press
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

HOFFNER PLLC
800 Third Avenue, 13th Floor
New York, NY 10022
Tel: (212) 471-6203
Fax: (212) 935-5012
Email: hoffner@hoffnerpllc.com

By: _____
David S. Hoffner
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

SO ORDERED: *10 December 2015*



HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT COURT JUDGE
SOUTHERN DISTRICT OF NEW YORK

TORYS LLP
1114 Avenue of the Americas, 23rd Floor
New York, NY 10036
Tel: 212.880.6268
Fax: 212.682.0200
Email: ccaparelli@torys.com

By: _____
Christopher M. Caparelli
Counsel for defendant Michael Shaw

GORDON REYKDAL
Defendant *pro se*


KIRBY McINERNEY LLP
825 Third Avenue, 16th Floor
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540
Email: ipress@kmlp.com

By: _____
Ira M. Press
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

HOFFNER PLLC
800 Third Avenue, 13th Floor
New York, NY 10022
Tel: (212) 471-6203
Fax: (212) 935-5012
Email: hoffner@hoffnerpllc.com

By: _____
David S. Hoffner
*Co-Counsel for Lead Plaintiffs Globis
Capital Partners, L.P. and Globis Overseas
Fund, Ltd.*

SO ORDERED: *10 December 2015*


HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT COURT JUDGE
SOUTHERN DISTRICT OF NEW YORK